

ORIGINALFILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

(Del. Rev. 12/98)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARERenee M Butz

(Name of Plaintiff or Plaintiffs)

05 - 495

v.

CIVIL ACTION No. _____

Lawns Unlimited Ltd andEdward Fleming

(Name of Defendant or Defendants)

COMPLAINT UNDER TITLE VII
OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to *Title VII of the Civil Rights Act of 1964*, as amended, **employment discrimination**. Jurisdiction exists by virtue of 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff resides at

58 Hickory Drive

(Street Address)

North East Cecil

(City)

(County)

MD

(State)

21901

(Zip Code)

410 441 4300

(Area Code) (Phone Number)

3. Defendant resides at, or its business is located at

15089 Coastal Highway

(Street Address)

Milton Sussex DE

(City)

(County)

(State)

19968

(Zip Code)

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's Edward Fleming (Lawn Unlimited) place of business

(Defendant's Name)

located at 15089 Coastal Highway #

(Street Address)

Milton Sussex DE

(City)

(County)

(State)

19968

(Zip Code)

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5. The alleged discriminatory acts occurred on 01 09 2003 to 01 01 2004 (letter was dated on)
(Day) (Month) (Year)
6. The alleged discriminatory practice ☐ is ☒ is not continuing.
7. Plaintiff filed charges with the Department of Labor of the State of Delaware, Division of Industrial Affairs EEOC 4425 W Market St
(Agency) (Street Address) (City) Wilmington
New Castle DE 19802, regarding
(County) (State) (Zip Code) 09 01 2003 to 01 01 2004
defendant's alleged discriminatory conduct on (Day) (Month) (Year)
8. Plaintiff filed charges with the Equal Employment Opportunity Commission of the United States regarding defendant's alleged discriminatory conduct on: 01 02 2004
(Day) (Month) (Year)
9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter which was received by plaintiff on: 30 04 2005
(Day) (Month) (Year)

(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)

10. The alleged discriminatory acts, in this suit, concern:
- A. ☐ Failure to employ plaintiff.
- B. ☒ Termination of plaintiff's employment.
- C. ☐ Failure to promote plaintiff.
- D. ☒ Other acts (please specify below)

Cancelled health insurance without written notice
and did not offer Cobra. Did not receive Vacation,
Sick, and Personal Time. Delated overtime hours
and no pay out on bonus.

11. Defendant's conduct is discriminatory with respect to the following:

- A. ☐ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☒ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☐ Plaintiff's national origin

12. A copy of the charges filed with the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

13. If relief is not granted, plaintiffs will be irreparably denied rights secured by Title VII of the 1964 Civil Rights Act, as amended.

14. Plaintiff's has no adequate remedy at law to redress the wrongs described above.

THEREFORE, Plaintiff prays as follows: (Check appropriate letter(s))

- A. ☒ That all fees, cost or security attendant to this litigation be hereby waived.
- B. ☒ That the Court appoint legal counsel.
- C. ☒ That the Court grant such relief as may be appropriate, including injunctive orders, damages, cost and attorney's fees.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 7/15/05

Renee M. Butz
(Signature of Plaintiff)

(Signature of additional Plaintiff)